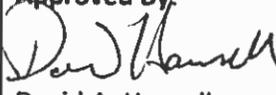


Identifying, Assessing, and Safety Planning with Child Sex and Labor Trafficking Victims

City of New York
Administration for Children's Services

Policy and Procedure
2018/xx

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		Anti-Trafficking Statute” • CPS Human/Sex Trafficking Desk Aid
<p>Supersedes:</p> <ul style="list-style-type: none"> Assessment and Safety Planning with Commercially Sexually Exploited (Sex Trafficked) Children Policy, Division of Child Protection, issued on June 11, 2012 	<p>Related Policies:</p> <ul style="list-style-type: none"> Policy #2012/01 “Promoting a Safe and Respectful Environment for Lesbian, Gay, Bisexual, Transgender and Questioning (LGBTQ) Youth and their Families Involved in the Child Welfare, Detention, and Juvenile Justice System <i>issued</i> on November 21, 2012 	<p>Key Words:</p> <p>trafficking, sex trafficking, labor trafficking, human trafficking, child sex trafficking, victim, at risk, at-risk children, youth, identification, documentation, report, reporting, victim services, trauma focused services, commercial sexual exploitation of children (CSEC), law enforcement, quick screening, rapid indicator tool, comprehensive screening, child sex trafficking indicators tool, ongoing screening, Native American, Lesbian, Gay, Bi-Sexual, Transgender, Questioning, LGBTQ, assessment, casework contacts</p>
<p>Related Forms:</p> <p>OCFS- 3921, Rapid Indicator Tool to Identify Children Who May Be Sex Trafficking Victims or Are At Risk of Being a Sex Trafficking Victim (Attachment C)</p> <p>OCFS-3920, Child Sex Trafficking Indicators Tool (Attachment D)</p> <p>OCFS-3922, Law Enforcement Report of a Child Sex Trafficking Victim (Attachment E)</p>		
<p>SUMMARY: This policy articulates guidelines and procedures for ACS and provider agency staff in identifying children and youth, who are in the care, custody, care and custody, maintenance, or supervision of the Administration for Children’s Services (ACS), who are victims of, or at risk of, commercial sexual exploitation or labor trafficking. Additionally, this policy provides guidance and procedures for ACS and provider agency staff in keeping these trafficked and exploited children and youth or at-risk children and youth safe and supported by safety planning, coordinating with law enforcement, and making referrals for appropriate services.</p>		
<p>SCOPE: This policy applies to all ACS and provider agency staff involved in the care, custody, care and custody, maintenance, or supervision of children, youth and young adults of any age who remain in care.</p>		

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Additional resources available via the following links:

ACS' Trafficked Youth web pages:

[http://www1.nyc.gov/site/acs/youth/traffickedyouth.page;](http://www1.nyc.gov/site/acs/youth/traffickedyouth.page)

I. Purpose

The New York City Administration for Children's Services (ACS) is committed to keeping children and youth who are in its care, custody, care and custody, maintenance, or under our supervision, safe from sex trafficking/commercial sexual exploitation and labor trafficking. Statistics and studies have shown that children and youth involved in the child welfare system and in the juvenile justice system are particularly vulnerable to sex trafficking/commercial sexual exploitation.¹

In September 2014, the federal government passed the Preventing Sex Trafficking and Strengthening Families Act² to help address sex trafficking and the commercial sexual exploitation of children (hereinafter "CSEC"³) involved in the child welfare and juvenile justice systems. Based upon this legislation, in September 2015, the New York State Office of Children and Family Services (OCFS) issued the Administrative Directive 15-OCFS-ADM-16, *Requirements to Identify, Document, Report and Provide Services to Child Sex Trafficking Victims* to notify local departments of social service (LDSS), including ACS, of new procedural requirements.

ACS is issuing this policy in accordance with these procedural requirements to provide a practice outline for the identification, documentation, safety planning, and provision of appropriate services to children who are sex trafficking victims or at risk of becoming sex trafficking victims. This policy will additionally provide guidance on children who are identified as labor trafficked. Finally, this policy will outline practice requirements and provide guidance and additional resources for ACS staff and provider agency staff who, in collaboration with law enforcement, refer children and youth who are victims of sex trafficking for the state confirmation process, coordinate with trauma-focused service providers,⁴ and help keep children and youth safe and supported. While this policy outlines required screening and reporting requirements, **staff must immediately call 911 if they suspect a child is in immediate danger or risk of harm.**

Sex trafficking is not the only form of human trafficking. Staff must be alert for indicators and red flags that children and their family members are victims of labor trafficking. Some victims may be both sex and labor trafficked. Staff who identify sex and/or labor trafficking are required to document and report their suspicions immediately to the ACS Office of Child Trafficking Prevention and Policy (OCTPP) at child.trafficking@acs.nyc.gov for additional guidance. See 17-OCFS-INF-03, *New York State Processes Related to Notifications of Victims of Human Trafficking* for additional information.⁵

II. Definitions

- A. The Child Trafficking Database (CTDB) is a system that allows assigned staff to complete the mandated sex trafficking screening tools in an electronic web-based format, which permits

¹ Polaris Project (2014)) www.polarisproject.org; Human Rights Project for Girls (2015)) <http://rights4girls.org/wp-content/uploads/r4g/2015/03/DCST-and-JJ-System.pdf>; SPARC "Child Sex Trafficking and the Child Welfare System" (2014) <http://childwelfareparc.org/wp-content/uploads/2014/07/Sex-Trafficking-and-the-Child-Welfare-System.pdf>

² 113 P.L. 183 (2014)

³ See Section II[B].

⁴ N.Y. Soc. Serv. Law § 447-b.

⁵ 17-OCFS-INF-03: New York State Processes Related to Notifications of Victims of Human Trafficking.

every screening to be recorded and saved for future access by other workers assigned to a child, thereby complying with mandated federal tracking requirements. The Child Trafficking Database (CTDB) Summary (Attachment B) describes the application. The CTDB Reference Guide for Screeners and Supervisors provides detailed guidance for staff on accessing and using the CTDB to complete the screenings in this system.⁶

- B. Child Sex Trafficking Victim – Any child under age 18 who is induced to perform a commercial sex act is considered a sex trafficking victim regardless of whether force, fraud, or coercion is present.^{7 8}
- C. Commercial Sex Act – Where something of value – money, food, clothing, drugs, shelter, protection, or other consideration – is provided in exchange for a sex act. This can also include child pornography (photos or videos), exotic dancing or performance, stripping, escort services, or trading sex for basic needs.⁹
- D. Commercial Sexual Exploitation of Children (CSEC) – Comprises sexual abuse and remuneration in money, goods, or services - or the promise of money, goods, or services – to the child or a third person or persons for the sexual use of a child. The child is treated as a commercial sex object.^{10 11}
 - 1. CSEC is referred to as a “severe form of trafficking in person” in federal law, and is defined as “sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has **not attained 18 years of age.**”¹²
- E. CONNECTIONS (CNNX) – The New York State automated system designed to create a single integrated statewide system for collecting and recording child protective, prevention, foster care, adoption, and Close to Home information.
- F. Indicator(s) – For purposes of this policy, “indicator” refers to a sign or warning of a problem requiring attention, and/or factors associated with increased vulnerability. Also known as “trigger(s)” or “red flag.”¹³
- G. Labor Trafficking – Refers to a crime where a person compels or induces another person to engage in labor, or recruits, entices, harbors, or transports such other person by means of intentionally: (1) providing the victim with certain drugs; (2) requiring servicing of a debt that is caused by a course of conduct, with intent to defraud such a person; (3) withholding or destroying government identification documents; (4) using force or engaging in any scheme,

⁶ See Child Trafficking Database Summary (Attachment B)

⁷ 15-OCFS-ADM-16: Requirements to Identify, Document, Report and Provide Services to Child Sex Trafficking Victims, page 5.

⁸ Victims of Trafficking and Violence Prevention Act of 2000 (TVPA), Public Law 106-386, H.R. 3244.

⁹ 15-OCFS-ADM-16 pp. 5-6

¹⁰ 15-OCFS-ADM-16

¹¹ Some people/documents refer to “commercially sexually exploited children” as CSEC, but in this policy, such children as “sex trafficking victim,” as defined in Section II[B].

¹² 15-OCFS-INF-03: Preventing Sex Trafficking and Strengthening Families Act (P.L. 113-183)

¹³ See Section III of 15-OCFS-ADM-16.

plan, or pattern to compel or induce such person to engage in labor activity by making that person fearful.¹⁴

- H. ACS Office of Child Trafficking Prevention and Policy (OCTPP) -- Raises awareness of trafficking and assists in identifying appropriate services available to help trafficked and at-risk youth and their families. OCTPP responds to all inquiries, provides consultation and technical assistance to ACS and provider agency staff, develops and provides training, maintains the CTDB, and works to develop policies and procedures for best practice work with trafficked and at-risk youth. Please see Attachment A for details.
- I. Safety Planning – For purposes of this policy, “safety planning” refers to an ongoing process of prioritizing the child or youth’s physical and emotional safety while breaking away or following having broken away from the trafficker at various points of case management, including initial contact with the child or youth, during standard case planning meetings, and before discharge.
- J. Sex Trafficking – The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.¹⁵
- K. Trauma-Focused Services – Also known as “trauma-specific interventions” or “trauma-informed services.” Services or treatments that are specifically developed for children and youth exposed to violence and trauma.¹⁶

III. Identifying Children and Youth Who Are Victims of, or At-Risk for Sex Trafficking¹⁷

Case planners and other child-serving staff are encouraged to seek additional guidance and consultation from ACS’ Office of Child Trafficking Prevention and Policy (OCTPP),¹⁸ Investigative Consultants (ICs), and clinical consultants from the ACS Clinical Consultation Program (CCP), as appropriate.¹⁹ All staff are expected to familiarize themselves with indicators of, and vulnerabilities to sex trafficking.²⁰ The following are some indicators to help identify victims of sex trafficking:

- A. History of sex abuse and/or a reason to believe that the child is currently being sexually abused or exploited.
- B. A reason to believe there are photographs, social media posts, or other recordings of child posed or dressed provocatively and/or instance(s) of sexual acts with or abuse of a child,

¹⁴ NY Penal Law § 135.35

¹⁵ 15-OCFS-INF-03

¹⁶ “Reducing the Trauma of Investigation, Removal, & Initial Out-of-Home Placement in Child Abuse Cases.” Center for Improvement of Child and Family Services, Portland State University School of Social Work, page 16.

<http://ocfs.ny.gov/main/cfsr/Reducing%20the%20trauma%20of%20investigation%20removal%20%20initial%20out-of-home%20placement%20in%20child%20abuse%20cases.pdf>

¹⁷ Please note that when working with Native American youth, there is significant guidance from OCFS in reference to the Indian Child Welfare Act (ICWA). More information can be found at <http://ocfs.ny.gov/main/nas/>

¹⁸ Contact at Child.trafficking@acs.nyc.gov

¹⁹ Attachments O and Q for business processes for Foster Care and Prevention case planners.

²⁰ Please see the OCFS resource website for a full list of indicators, found [here](#). Questions about indicators may be sent to Child.trafficking@acs.nyc.gov. Training requests may be sent by the program director to Traffickingtraining@acs.nyc.gov

particularly if such images or recordings are publicly available (i.e., not limited to “private” settings or on sites that the child does not manage).

- C. The child has a history of running away and/or absences without consent (AWOCs) or episodes of homelessness/couch-surfing in the past (except family homelessness), including frequent short absences or lengthy absences.
- D. The child has tattoos that show, imply, or suggest ownership and/or that he or she does not have an explanation for (e.g. daddy’s girl, property of someone’s name, or other symbols indicative of sex trafficking).²¹
- E. Unaccounted-for money or goods that do not fit the youth’s financial situation, including mobile phones, drugs and alcohol, or an unaccounted for person who supplies these goods/money to child/youth. Examples may include frequent manicures or hair styling, hotel stays, and/or designer clothing or shoes or electronics the youth is not known to be able to reasonably afford.
- F. Having an older boyfriend/girlfriend, especially if he or she appears controlling; youth appearing fearful of boyfriend/girlfriend at times.
- G. Associating with adults or other children/youth, who are being trafficked or are known to be involved with trafficking and/or exploitation.
- H. Use of slang trafficking terms (e.g. calling the romantic partner “Daddy” or “Mommy,” talking about “the life,” “the game,” “bottom,” “out of pocket” (to look at or talk to another pimp) or “track” (a street location for commercial sex). See the OCFS handbook, *Responding to Commercially Sexually Exploited and Trafficked Youth*²² for a longer list of terms.
- I. A child or youth who identifies as lesbian, gay, bi-sexual, transgender, or questioning (LGBTQ) and is estranged from his or her family.
- J. A child or youth who significantly reduces contact with family, friends or other support networks and/or who significantly withdraws from previous activities.
- K. A child or youth who has had multiple sexually transmitted infections (STIs), pregnancies and/or multiple miscarriages or abortions.
- L. A child who reports that he/she has been trafficked or is engaging in commercial sex act(s).

IV. Screening for Sex Trafficking

A. General Requirements and Guidelines

1. If a child is in immediate danger or at risk of harm, the staff member must call 911.

²¹ Attachment J and Section IV(F) provide additional information on tattoo removal regarding trafficked and former gang-involved youth.

²² This handbook can be found here: <https://ocfs.ny.gov/main/humantrafficking/resources/OCFS-Handbook-for-Office-print.pdf>

2. For the purposes of this policy, the outlined requirements and guidelines apply to all ACS staff with a case management role in a case and contracted provider agency case planners or their agency's designee²³ (hereinafter "staff") who are involved in the investigation of, or the care, custody, care and custody, maintenance, or supervision of any child or youth under the age of 18 and any youth 18 or over in care.²⁴
3. Staff must review and follow the Child Trafficking Database (CTDB) Reference Guide for instructions while conducting the Sex Trafficking screening (hereinafter "screening") for a child or youth in the CTDB.
4. The tools and protocols must be completed by staff as listed in the order below, as required. More information regarding the specific tools and/or actions is detailed below, starting with Section IV B:
 - a. OCFS-3921: *Rapid Indicator Tool to Identify Children Who May Be Sex Trafficking Victims or At Risk of Being a Sex Trafficking Victim* (also known as the Rapid Indicator Tool or Quick Screening,) must be completed and entered into the CTDB for all children;
 - b. OCFS-3920: *The Child Sex Trafficking Indicator Tool* (also known as the Comprehensive Tool,) if any indicator(s) was selected on the Rapid Indicator Tool screening and/or a child discloses historic or current sex trafficking victimization;
 - c. *Law Enforcement Report of a Child Sex Trafficking Victim* (also known as the Law Enforcement Report Form), if the Comprehensive Tool indicates that the child's experiences meet the Federal Definition Level of a child sex trafficking victim;
 - d. Safety planning with a focus on harm reduction must occur with all identified sex trafficking victims and all children/youth at risk of CSEC, and referral to appropriate services with providers experienced in working with trafficked youth;
 - e. NYS Referral Form for child/youth meeting the Federal Definition Level of child sex trafficking victim²⁵; and/or
 - f. Service referral(s) for children/youth screened at medium or high risk levels.²⁶
5. The Child Trafficking Database (CTDB)

²³ See Attachments N-Q for additional information on which staff in specific divisions and/or program areas are responsible for the screening, documenting and reporting process.

²⁴ The CSEC screening can potentially apply to any youth up to the age of 25 years old under limited circumstances. For example, the CSEC screening applies if the youth re-entered foster care from ages 18 to 21 years old and plans to attend college or if the youth is 21+ years old and remains in care.

²⁵ 17-OCFS-INF-03.

²⁶ Per form OCFS-3920 (Attachment E): For High Risk Level: Close monitoring and intensive case management services to address current, or prevent future trafficking. For Medium Risk Level: Child should be more closely monitored and provided services that may address current, or prevent future trafficking.

- a. The CTDB must be used to enter all rapid and comprehensive screening results, with the exception of Advocates Prevention-Only cases (ADVPO cases).²⁷ Staff assigned to ADVPO cases must continue to use the paper version of the tools within the same time frames as the CTDB (see below) when conducting the screening for a child or youth, and adhere to the same deadlines.²⁸ These paper tools are stored in the youth's case record.
- b. Staff must complete the child or youth's initial screening and any subsequent screenings, where required by the division or program (see Attachments O-R), in the CTDB as soon as possible, but not more than 30 days from the date of its initiation. Screenings shall be completed and included in the CTDB as soon as possible. If the screening is not completed within 30 days, the CTDB will finalize the screening and will be considered an incomplete screening.
- c. The person with case planning responsibility for the child is responsible for the screening, documentation and reporting requirements outlined in this policy. For cases with multiple assigned workers, it is **the worker with child planning responsibility** that is required to timely conduct the CSEC screening, and document the required information in CNNX and in the CTDB.
- d. Finalized screenings in the CTDB can only be re-activated for two weeks after completion, and only by the supervisor of a unit to insert the Law Enforcement referral information resultant of OCFS-3922: *Law Enforcement Report of a Child Sex Trafficking Victim Form* (hereinafter "Law Enforcement Form"), if the Law Enforcement Form information for a child meeting the Federal Definition Level of trafficking was incomplete at the time of screening finalization in the CTDB.
- e. An incomplete screening that becomes finalized in the CTDB does not fulfill the screening mandate. Staff must manually generate a new screening in the CTDB and complete the screening to fulfill the screening mandate.
- f. **Even if a child or youth discloses sex trafficking** during the course of an assessment, custody, investigation, placement, program enrollment, or supervision, staff must complete the screening in the CTDB, indicating that the child or youth meets the Federal Definition of a child sex trafficking victim, and fill in the required information as prompted in the CTDB and any other designated record or file.²⁹

6. CNNX Sex Trafficking Screening Window

²⁷ ADVPO cases include families who are voluntarily receiving prevention services, but whose parent/guardian is not being investigated for abuse or neglect.

²⁸ To maintain the confidentiality required by the Advocate's Agreement, assigned staff must not screen children or youth on ADVPO cases in the CTDB. Instead, staff must complete the screening on paper format within 30 days of screening initiation, by the due date of the initial Family Assessment Service Plan (FASP), or by the due date of each subsequent FASP.

²⁹ For ADVPO cases, staff must indicate whether the child or youth meets the federal definition of a child sex trafficking victim in the paper forms.

- a. In addition to documenting all screening results in the ACS CTDB, staff must enter all screening results from the CTDB (or paper form for ADVPO cases) in the CNNX *Sex Trafficking Screening* window.³⁰
 7. In addition to the reporting requirements described in this policy, staff must immediately call in a report of abuse or maltreatment to the Statewide Central Register (SCR) if there is a concern or suspicion that the parent or person legally responsible is involved in the sex trafficking of the child or youth.
- B. Initial Screening for Sex Trafficking With the Rapid Indicator Tool³¹
1. Staff must complete the **Rapid Indicator Tool** (OCFS-3921, Attachment C) to determine whether the child or youth is a victim of child sex trafficking or is at risk of becoming a victim as soon as possible.³² Staff assigned to ADVPO cases must complete and file the paper format of the Rapid Indicator Tool within 30 days. The Rapid Indicator Tool must be completed prior to the completion of the initial Family Assessment and Service Plan (FASP, which is similarly required to be completed within 30 days for applicable children and families) and/or prior to the conclusion of a child protective or Family Assessment Response (FAR) case. OCFS guidance regarding the screen captured with the Rapid Indicator Tool refers to this step as the “Quick Screening.”
 2. The **Rapid Indicator Tool** is not designed to be used as an interview tool for children and youth. It may never be revealed in the presence of a child or family member. Instead, staff are expected to be familiar with the tool indicators, and observe and ask related questions to obtain relevant information and complete the **Rapid Indicator Tool** as indicated and in the timeframe specified by each division/program (see Attachments O-R). Staff shall continue to be alert for indicators during ongoing interactions with the child, and shall complete another screening as needed when indicators are newly observed or reported.
 3. If the **Rapid Indicator Tool** finds that the child or youth does not have any indicators that give cause to believe the child or youth is a child sex trafficking victim, or is at risk of becoming a victim, no further screening is needed and the screening is complete until otherwise specified in this policy. However, staff must monitor the child or youth on an ongoing basis.
 4. If any indicator(s) is selected on the **Rapid Indicator Tool** that gives cause to believe the child or youth is a child sex trafficking victim, or is at risk of becoming a victim, staff must proceed to the **Comprehensive Tool** to determine the level of risk for the child or youth. Staff shall select all applicable indicators and enter the identified indicators into the CTDB.

³⁰ For additional information, see the 2016 OCFS Job Aid, “[Changes to the CONNECTIONS Family Services Stage \(FSS\) – Phase 4.](#)”

³¹ 15-OCFS-ADM-16

³² See Attachments N-Q for requirements and guidelines for specific divisions and/or program areas, for the circumstances where this screening and subsequent screenings must be completed, as well as further details on the screening, documenting, and reporting process.

5. The Rapid Indicator Tool must be used to screen children and youth prior to each comprehensive FASP due date and/or prior to the closure of a child protective investigation or FAR case, regardless of the outcome of the case (see part H within this section for additional ongoing screening expectations).

C. Comprehensive Screening for Sex Trafficking

1. Staff must complete the **Comprehensive Tool** (OCFS-3920, Attachment D) in the CTDB for all children and youth for whom one or more indicator was selected from the **Rapid Indicator Tool**, and enter the results from the CTDB into the CNNX Sex Trafficking Window as soon as possible, but within no more than 30 days of completing the **Rapid Indicator Tool**. Staff assigned to ADVPO cases must complete the paper format of the **Comprehensive Tool** within the same required timeframe. Staff must note the following points while completing the **Comprehensive Tool**:
 - a. Staff must not use the **Comprehensive Tool** as a questionnaire. Instead, staff are expected to use their knowledge of the tool's listed indicators in observations and interactions with the child, as well as when reviewing the child's case history and other documentation, and when discussing the child's needs and strengths with others in the child's life. The **Comprehensive Tool** shall reflect the information gathered based on the staff's ongoing casework contacts, and/or during the course of a child protective investigation, and/or during the youth's program enrollment, and/or during the youth's custody or detention.
 - b. If, at any time, the child or youth discloses that he or she is a victim of child sex trafficking, staff must immediately check the applicable box in the "Federal Level Indicator" tab of the **Comprehensive Tool** screen in the CTDB indicating that the child or youth is a child sex trafficking victim.³³ Staff must proceed with law enforcement notification, safety planning, confirmation process, and service referral protocols pursuant to this policy (see Section IV. D-F.).
2. If the **Comprehensive Tool** reflects that the child or youth meets the Federal Definition Level of a sex trafficking victim,³⁴ staff must report this to law enforcement immediately, but no later than 24 hours³⁵ after identification of the child or youth as a victim (see Section IV. D. below for the notification process). Staff must notify the Office of Child Trafficking Prevention and Policy,³⁶ seek immediate consultation from the Investigative Consultation Team (if applicable to the division), and proceed to subsequent steps as per this policy.
3. If the **Comprehensive Tool** indicates that the child or youth is at "high risk," or "medium risk" of becoming a child sex trafficking victim, staff must document the screening results in CONNECTIONS (CNNX) or the designated record or file, continue to monitor the case for as

³³ For Advocate cases, staff must check off the applicable box in the "Federal Level Indicator" section in the paper format (Comprehensive Tool).

³⁴ See federal definition of "child sex trafficking victim" in Section II of this policy

³⁵ 15-OCFS-ADM-16

³⁶ Child.trafficking@acs.nyc.gov

long as it is open, based on the indicator level (see Section IV. F.), and provide service referral(s) (see Section IV. E.) to address any indicators present.

- a. If the child or youth is in foster care, staff must indicate in the CTDB, CNNX, and in the designated record/file whether the victimization occurred prior to or while the child or youth was in foster care.

D. Reporting Child or Youth Identified as a Sex Trafficking Victim to Law Enforcement

Staff must report any child or youth who is identified as a victim of child sex trafficking to law enforcement immediately, and no later than 24 hours³⁷ after identification of the child or youth as a victim. **If a child is in immediate danger or at risk of harm, the staff member must immediately call 911.**

1. Staff must notify law enforcement in the following ways:
 - a. Staff must complete the OCFS 3922: **Law Enforcement Report of A Sex Trafficking Victim form** (Attachment E) and follow the instructions on the form:
 - i. Fax the **Law Enforcement Report Form** to the number on the form (there are separate numbers for New York City cases and New York State cases);
 - ii. Call the New York City number on the form (for the NYPD) to confirm receipt of the **Law Enforcement Report Form** and obtain a log number and the name of the detective taking the staff member's call;³⁸
 - a) **Weekdays, 10 am to 6 pm:** Fax the form to 212-694-3149 or 212-694-0264, and follow up with a phone call to (212) 694-3013 (Vice Division Office), available Monday through Friday, 10 am to 6 pm.
 - b) **After 6 pm, or on weekends:** call (646) 610-7272 (Special Victims/Human Trafficking Hotline), available 24/7/365. SVU will then forward information to the Division office and it will be assigned an LER number accordingly.
 - c) **Alternately, for weekends, email** the form to ved@nypd.org with "HT" in the subject line. Then follow up by calling during the next business day to obtain the LER number.
 - iii. Document the log number and the detective's name who took the staff member's call, as soon as possible, but not more than 30 days after screening initiation in the CTDB, the CNNX sex trafficking screen, CNNX progress note, and any other designated record/file.
 2. Staff must notify child.trafficking@acs.nyc.gov with the assigned log number and the name of the detective who took the staff member's calls, along with the ACS case number, and first name of the child or youth.

³⁷ 15-OCFS-ADM-16

³⁸ Note - a separate detective will get assigned to the case/child or youth after the "Law Enforcement Report Form" is submitted and processed.

3. If, due to law enforcement's delay, staff is unable to obtain the log number and/or the name of the detective taking the staff member's call within 30 days of screening initiation, the supervisor of the unit under which the screening was conducted has two weeks in which to re-activate the screening in the CTDB when law enforcement provides the necessary information.³⁹

E. Refer Sex Trafficking Victim for the State Confirmation Process⁴⁰

1. Staff must notify the New York State Office of Temporary and Disability Assistance (OTDA) and the New York State Division of Criminal Justice Services (DCJS) immediately of any child or youth who meets the federal definition of child sex trafficking victim or reasonably appears to be a sex trafficking victim.⁴¹ Staff must notify OTDA and DCJS by taking the following actions:
 - a. Complete the hard copy version of the **NYS Referral Form** (Attachment F) as soon as practicable after encountering a child or youth who meets the Federal Definition Level of sex trafficking;⁴²
 - b. Fax the **NYS Referral Form** to the number on the form.
2. OTDA shall notify ACS/provider agency and the child or youth regarding whether the child or youth is a State-confirmed trafficking victim⁴³ and if so, is eligible for benefits and services from a case management provider or any other available source.⁴⁴
3. Staff must immediately assist the child or youth in obtaining the eligible benefits and services, if any.
4. Staff must document OTDA's response, communications with the child or youth regarding OTDA's response, and communications with the referred service provider(s), if any, in CNNX, the case file or record, and any other designated database.

F. Safety Planning

Safety planning is always necessary when working with an identified or possibly sex-trafficked child or youth. Case planners are responsible for working with youth safety plans that are flexible, individualized for the youth, and must be reviewed and updated regularly. Additionally, safety plans

³⁹ The NYPD treats youth who are sex trafficking victims as "rescues," although they may charge the youth. Staff working with a youth and with the NYPD should not discourage the youth from talking with law enforcement, but must also be sure not to coerce youth to talk.

⁴⁰ 17-OCFS-INF-03: "New York State Processes Related to Notifications of Victims of Human Trafficking"

⁴¹ NY Penal Law § 230.34; 17-OCFS-INF-03

⁴² NY Penal Law § 230.34; 17-OCFS-INF-03

⁴³ 18 NYCRR § 765.4; 9 NYCRR § 6174.3

⁴⁴ 9 NYCRR § 6174.3; A child or youth meeting the criteria for certification as a victim of a severe form of trafficking may be eligible for federal, state, or local benefits and services, as determined by OTDA; see 18 NYCRR 765.6.

must provide for both emotional and physical safety, which includes referring the youth to service providers who are knowledgeable about sex trafficking.

1. Safety planning with an identified sex trafficked child or youth:
 - a. Staff must develop a safety plan with any identified sex trafficked child or youth to increase the likelihood of the plan succeeding. The safety plan shall reflect that the following steps were reviewed:
 - i. Assess current and potential risks and safety concerns;
 - ii. If applicable, refer the child or youth to the NYC Child Tattoo Eradication Network. The mission of this network is to assist trafficking victims and former gang members in positively moving forward with their lives through the removal of exploiter brandings and gang-related tattoos, along with relevant, trauma informed support. Based upon the widespread recognition that exploiter and/or gang related brandings inhibit the emotional healing progress, the OCTPP is developing a comprehensive network towards meeting the needs of identified youth who want to progress positively with their lives. A youth will need to discuss the specific request with the medical provider before making an informed decision. Parental consent is necessary, unless the youth is married or is a parent.⁴⁵
 - iii. Consider whether the parent or person legally responsible is involved in the child or youth's trafficking;⁴⁶
 - iv. Create strategies to avoid or reduce the threat of harm (e.g. avoiding routes where the trafficker is known to frequent). It may take a child multiple attempts to leave. Discuss various options and/or back-up plans if one should fail;
 - v. Conduct a debriefing with the child or youth when a child or youth returns to the facility, placement, or program after being absent without consent, missing, or abducted.⁴⁷ Staff must use the debriefing tool⁴⁸ as a guide to assess safety concerns and address harm reduction with the child or youth; and
 - vi. Outline actionable steps for the child or youth to take to stay safe in potentially dangerous situations, such as:
 - a) Planning an escape route or exit strategy, and rehearsing it, if possible;

⁴⁵ Attachment J: NYC Child Tattoo Eradication Network - Referral Protocol

⁴⁶ As a reminder, if a parent/guardian or other person legally responsible is known or reasonably suspected to be involved in the trafficking, staff are mandated to report to the SCR.

⁴⁷ 16-OCFS-ADM-09: Protocols and Procedures for Locating and Responding to Children and Youth Missing From Foster Care and Non-Foster Care, issued on May 5, 2016.

⁴⁸ Attachment K: Debriefing Tool for Children and Youth Who Have Returned After Being Absent Without Consent, Missing, or Abducted, issued on May 5, 2016.

- b) Keeping any important documents on the child or youth in preparation for an immediate departure;
 - c) Preparing a bag with any important documents/items and a change of clothes;
 - d) Considering a change of phone numbers to a number unknown by the trafficker;
 - e) Having the child or youth identify trusted friends or relatives who can help support the safety and service plan; and/or
 - f) Providing the child with contact numbers for service providers⁴⁹ or the National Human Trafficking Resource Center (NHTRC) hotline (888-373-7888 or text to 233733) to obtain further assistance (see below for information about service referrals and providers).
- b. Staff must document the safety plan in CNNX, and any other designated database, file, form, or record.
1. Safety planning with a child or youth at risk of becoming a sex trafficked victim
- a. Staff must engage in safety planning with any child or youth found at risk of becoming a sex trafficking victim, or is confirmed to be a sex trafficking victim, by focusing on the importance of harm reduction. Staff must:
 - i. Assess potential risks and safety concerns with the child or youth;
 - ii. Conduct a debriefing with the child or youth when a child or youth returns to the facility, placement, or program after being absent without consent, missing, or abducted.⁵⁰ Staff must use the debriefing tool⁵¹ as a guide to assess safety concerns and address harm reduction with the child or youth; and
 - iii. Provide contact numbers for service providers⁵² and information about resources to the child or youth such as:
 - a) The National Human Trafficking Resource Center (NHTRC) hotline (888-373-7888 or text to 233733)⁵³;
 - b) Drop-in centers; or
 - c) LGBTQ Affirming support services, Immigrant services, or legal assistance⁵⁴

⁴⁹ See Attachment I for list of LGBTQ-affirming and anti-trafficking hotlines and service providers.

⁵⁰ 16-OCFS-ADM-09.

⁵¹ Attachment K: Debriefing Tool for Children and Youth Who Have Returned After Being Absent Without Consent, Missing, or Abducted, issued on May 5, 2016.

⁵² See Attachment I for NYC Services for Trafficked and At-Risk Youth.

⁵³ See Attachment G for a complete list of Hotlines.

⁵⁴ See Attachment G for a complete list of Hotlines.

- b. Staff must document the safety plan in CNNX progress notes and any other designated database, file, form, or record.

G. Document Service Referrals and Plan and Service Plan in the FASP

As always, the child's service needs and the referrals and services connected to those identified needs, which includes referrals to services related to the child's safety plan, must be documented in the child's FASP.

1. CTDB screening results must inform the child's FASP, and thus must be completed by the FASP due date.
2. Staff shall consider whether the following needs of identified sex trafficked victims, or at-risk children and youth, are being met in their homes, placements, or facilities in order to effectively assess for appropriate services.
3. Appropriate services for victims of sex trafficking include, but are not limited to trauma-focused services and supports, services offered by providers who specialize in working with children at risk or with a history of sex trafficking, and any service identified as part of the child's safety plan.
4. Staff must document the assessment for appropriate services and any service referrals made in CNNX, and any other designated database, file, form, or record, including the child's FASP.

H. Ongoing Screenings for Sex Trafficking

1. Staff are expected to remain alert to indicators throughout ongoing contacts with the child and the child's placement and supports, and must complete subsequent sex trafficking screenings throughout the life of a case, especially when the following occur:
 - a. A child or youth discloses new information about sex trafficking victimization or risk, or a significant life change related to a trafficking indicator;
 - b. Staff observe indicators that give cause to believe the child or youth is a victim or is at risk of being a sex trafficking victim;
 - c. A child or youth returns from runaway status or after having been AWOC from foster care;⁵⁵ and
 - d. Prior to the due date of every comprehensive Family Assessment Service Plan (FASP).
2. Staff must document the following in the CTDB (see Attachment B), CNNX, and any other designated database, file, form, or record:
 - a. Complete any currently active screenings in the CTDB, or if there is no active screening to complete;

⁵⁵ 16-OCFS-ADM-09.

- b. Complete a new **Rapid Indicator Tool** and, if indicated as described in section IV(B) above, the **Comprehensive Tool** based any indicators selected on the **Rapid Indicator Tool**;
- c. Note any changes to the level of indicators from the prior screening (for example, if a child had previously been reported at medium-level risk for sex trafficking is now observed to have new indicators at the high-risk level);
- d. Completion of law enforcement notification for children and youth identified as child sex trafficking victims;
- e. Safety planning and related service referrals made for children and youth identified, or at risk of becoming sex trafficking victims conducted;
- f. Referral to state confirmation process for trafficking victims if applicable.

V. Labor trafficking

In addition to screening and documenting indicators of sex trafficking, staff must also be alert to signs that a person with whom they interact is a victim of labor trafficking, and must document and report labor trafficking as outlined in this section.

A. Indicators

1. The presence of one indicator does not mean a child or youth is a trafficking victim; rather a pattern of red flags and vulnerabilities is a more accurate prediction of labor trafficking. Many youth are both sex and labor trafficked. Indicators may apply to both sex and labor trafficked youth.
2. Indicators of labor trafficking include, but are not limited to:⁵⁶
 - a. No control of income, finances or identification documents;
 - b. Unpaid, underpaid, or paid only through tips;
 - c. Works excessively long/unusual hours;
 - d. Limited freedom to leave working/living conditions;
 - e. Lives and works in the same place;
 - f. Signs of trauma, fatigue, injuries, or abuse;
 - g. Controlled/restricted communications;

⁵⁶ 15-OCFS-INF-08: Promoting Awareness and Best Practices to Address Human Trafficking, issued on August 26, 2015.

- h. Excessive/inappropriate security features;
- i. Excessive fearfulness of law enforcement;
- j. Non-cooperativeness;
- k. Unexplained absences from school for a period of time; and/or
- l. Running away chronically.

B. Procedure for Suspected Labor Trafficking Cases

1. Staff must immediately notify the ACS Office of Child Trafficking Prevention and Policy (OCTPP) at Child.trafficking@acs.nyc.gov for all suspected labor trafficking cases for notification and guidance.
 - a. If applicable, staff must contact an IC for suspected labor trafficking for further consultation and guidance.
 - b. If applicable, staff may contact the ACS Office of Immigrant Services at 917-551-7961 or the New York State Department of Labor Division of Immigrant Policies and Affairs, via phone at 877-466-9757, or email at trafficking@labor.ny.gov for further guidance and information.
2. Staff must immediately call in a report of abuse or maltreatment to the SCR if there is a suspicion or concern that the parent or person legally responsible is involved in the child or youth's labor trafficking.
3. Staff must document his or her contact with the ACS Office of Child Trafficking Prevention and Policy, the IC, and the SCR in CNNX and any other designated database, file, form, or record.

The ACS Office of Child Trafficking Prevention & Policy (OCTPP) Description

The ACS Office of Child Trafficking Prevention & Policy (OCTPP) works to raise awareness of trafficking and helps to identify appropriate services available to help youth at-risk and victims of commercial sexual exploitation and their families.

In 2013, the New York State Office of Children and Family Services (OCFS) allocated a grant to New York City and other counties to support services mandated by the Safe Harbor Act of 2008. Susan Morley, Special Advisor to the Commissioner for Investigations, initially led the management of the grant, with assistance from several divisions. Due to the recognition of the continually increasing number of youth being identified as trafficked or using sex as a means for survival, ACS utilized some of the grant funding to hire a consultant to develop a strategic plan towards best practice work with sexually exploited children.

Resultant of the plan's recommendations, in 2015, ACS appointed Selina Higgins, MA, MSW, LCSW-R, as its first Director of the Office of Child Trafficking Prevention and Policy (OCTPP), under the supervision of Susan Morley, ACS' Senior Advisor for Investigations. In 2017, in recognition of the need to provide closer connection and support to the agencies that care daily for trafficked and at-risk of trafficking children, on December 21, 2017 ACS relocated its Office of Child Trafficking Prevention and Policy (OCTPP) under the Division of Family Permanency Services' (FPS) Office of Older Youth Services (OYS). While OCTPP Director Selina Higgins now reports to Assistant Commissioner Sabine Chery, Susan Morley continues to work closely with OCTPP, providing guidance and expertise. Although housed within FPS, OCTPP leads all aspects of ACS' policy and practice concerning labor trafficked and commercially sexually exploited children across all of ACS' divisions, programs and contract and provider agencies.

OCTPP:

- Coordinates all aspects of ACS' policy and practice concerning children involved in human trafficking with all ACS divisions and programs and contract agencies.
- Manages the annual New York State Safe Harbor grant and other funding.
- Facilitates a continuum of diverse services to support trafficked and at-risk youth through collaboration with the NYC Department of Youth and Community Development (DYCD) and specialized service providers.
- Administrates the Child Trafficking Database (CTDB). The CTDB allows assigned staff to electronically complete the mandated OCFS sex trafficking screening tools. (See Attachment B: Child Trafficking Database.)
- Works cross-divisionally with ACS program areas to develop policies and procedures for best practice work with trafficked youth.
- Responds to inquiries, provides technical assistance, provides consultation for safety and service planning conferences, suggests resources, provides assistance during law enforcement recovery operations.
- Gathers data and prepares reports.

Attachment A

- Develops, provides and/or facilitates trainings directly, or through linkage with other trafficking experts, including large scale events during January is National Slavery and Human Trafficking Prevention Month.
- Develops Child Trafficking Awareness materials and ensures widespread distribution.
- Created and administrates “Movin’ On”: The NYC Child Tattoo Eradication Project and Provider Network.
- Maintains four electronic mailboxes, which ACS and contract and provider agency staff can use for notification of, and/or questions about a suspected or definitive trafficking case; request CTDB assistance; inquire about trainings, or inquire about tattoo removal for exploited or gang-involved youth:
 - **For Trafficked Child cases and questions,**
email: **Child.trafficking@acs.nyc.gov**
 - **For Child Trafficking Database (CTDB) concerns,**
email: **CTDB@acs.nyc.gov**
 - **For questions about upcoming training,**
email: **Traffickingtraining@acs.nyc.gov**
 - **For inquiries about tattoo removal for exploited or gang-involved youth:** **Child.tattoo.removal@acs.nyc.gov**

NYC Administration for Children's Services Child Trafficking Database (CTDB)

Administered by the ACS Office of Child Trafficking Prevention and Policy, the Child Trafficking Database (CTDB) allows assigned staff to complete the mandated OCFS sex trafficking screening tools, thereby alleviating the use of paper tools. The CTDB allows staff to view child trafficking screening histories of children on their caseload, input screenings and view caseload demographics relevant to screenings assigned. The CTDB permits every screening to be recorded and saved in the system for future access by a worker assigned to a child (and only when a worker is assigned to a child), and for administrative research and reporting needs, as required by Federal and State legislation.

Background

The 2014 federal legislation (*The Preventing Sex Trafficking and Strengthening Families Act*, required screening of every child within the child welfare system for potential sex trafficking and timely reporting to law enforcement of any child determined to be sex trafficked. It also required data collection concerning sex trafficked youth and youth at-risk of trafficking.

As a result of this legislation, in 2015, the NYS Office of Children and Family Services (OCFS) provided an Administrative Directive entitled *16-OCFS-ADM-15: Requirements to Identify, Document, Report and Provide Services to Child Sex Trafficking Victims (ADM)* for guidance, which took effect immediately. This is the guidance ACS is mandated to follow in screening and documenting sex trafficking. This ADM provides two specific tools for screening, and a Law Enforcement Report referral form.

The ADM provided the two screening tools (OCFS-3921 and OCFS-3920) in a paper format. However, due to the volume of cases within ACS and its contract agencies and detention facilities, large scale paper screenings do not permit the ability for a concise, longitudinal history of a trafficked child, or for accurate and timely data tracking. ACS therefore came up with a solution: the Child Trafficking Database (CTDB).

CTDB Development

The development of the CTDB has been divided into two phases: *Phase 1: Child Trafficking Screening Tool* and *Phase 2: Demographic and Service Data and Reports*. Phase I (launched on February 15, 2017) provides a mechanism for data input in relation to NYS Child Trafficking Screening mandates. Phase II (development to begin in 2018) will further develop the CTDB to provide input ability for extended demographic and service provision data, and to run reports at a variety of levels.

Who is to be screened in the CTDB?

All children in the care of the Administration for Children's Services (ACS), contracted foster care agencies, contracted preventive service agencies and juvenile detention facilities will be screened using the CTDB.

Who is NOT to be screened in the CTDB?

Children in Advocate (ADVPO) cases will not be screened in the CTDB. They will be screened, but with paper tools to maintain the confidentiality required by the Advocate's Agreement.

When will children be screened in the CTDB?

1. a Child Abuse/Maltreatment case is reported to ACS through the NYS Central Registry and an investigation is launched
2. a child enters or re-enters a Foster Care agency
3. a child is referred to a Juvenile Detention facility
4. a child undergoes intake by a Preventive Service agency
5. a child receives services from the Family Assessment Program
6. a child returns from AWOL
7. at the time of every Family Assessment Service Plan (FASP)

Who are the Screeners and What Can They Do?

Screeners are ACS staff or ACS-contracted providers assigned CTDB privileges. Assigned staff and their supervisors will be able to view the screening history of children on their caseload, complete screenings, create new screenings and view caseload demographics. Supervisors can do everything that a Screener can do, and can also view their unit as a whole, or view each assigned screener's caseload individually. Both screeners and supervisors have access to a "dashboard" which list all screenings to assigned, in progress and completed within the last seven days. Screenings completed in the CTDB can be printed for case record insertion, and can also be copied and pasted as a Word document into a Connections (database) Progress Note.

Case Assignment

Connections will automatically generate a screening to the CTDB within 24 hours of case/child assignment. Screeners also have the option to create screenings manually within the CTDB when a screening is not automatically tied to case assignment and Detention staff will always generate their screenings manually.

CTDB Phase II

In Phase II, the CTDB was enhanced to include an expanded demographics and services entry section for all youth identified as trafficked, which permits the longitudinal capture and accessibility of information. This permits large scale indicator identification, tracking, data collection and aggregation of all the trafficked youth identified through ACS' protective investigations and within the foster care, preventive and detention systems. The CTDB also permits reporting of data in the format required by OCFS with automatic report functionality, and extended levels of administrative access for divisional and agency managers and executives.

Training and Resources

Train the Trainer sessions have continually been provided to staff to develop internal capacity to train on, and use the CTDB. Requests for CTDB training sessions may be sent to Trafficking.training@acs.nyc.gov A specialized mailbox, CTDB@acs.nyc.gov is available for database challenges, issues and questions. A *Reference Guide*, *Training Slides*, and *Tip Sheets* have also been developed to assist staff in their work within the CTDB. All are available on DocuShare, in the Child Trafficking Awareness and Prevention Resources folder.

CTDB Administration

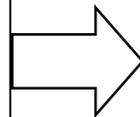
The CTDB is administrated by the ACS Office of Child Trafficking Prevention and Policy (OCTPP). OCTPP is responsible for collecting data and preparing reports mandated by the NY City Council and the NYS Office of Children and Family Services (OCFS). General questions about the CTDB may be referred to Selina Higgins, Director of Child Trafficking Prevention and Policy at Selina.higgins@acs.nyc.gov Questions on how to use the CTDB and challenges experienced may be referred to ACS' *Child Trafficking Database Mailbox* at CTDB@acs.nyc.gov

Who to Notify of a Trafficking Victim:

If a child meets the Federal Definition Level of Trafficking, please inform:

- NYPD to submit the *OCFS 3922 Law Enforcement Report of a Sex Trafficking Victim* and to obtain the Law Enforcement Report (LER) Number
- *The National Human Trafficking Hotline* at 888-373-7888 or Text to 233733
- If the child is trafficked **and** AWOL: *The National Center for Missing and Exploited Children* (NCMEC) at 1-800-THE-LOST (800-843-5678), or use their Cyber Tipline at www.missingkids.com
- If you are ACS, foster care, preventive, or detention staff, email the *ACS Child Trafficking Mailbox* at: Child.trafficking@acs.nyc.gov
- If the trafficker is a parent or person legally responsible: *The NY Statewide Central Register of Child Abuse and Maltreatment* at:1-800-342-3720
- *The NYS Office of Temporary and Disability Assistance (OTDA)* to commence the victim confirmation process. Fax the *New York State Referral of Human Trafficking Victim* to 518-485-9611.

**Please share with trafficking victims
and persons at-risk for trafficking:**



If you need help . . .
Text BeFree (233733) to the Polaris
Be Free Textline and National
Human Trafficking Hotline
1-888-373-7888



Office of Child Trafficking Prevention and Policy (OCTPP)

Division of Family Permanency / Office of Older Youth Services

David A. Hansell, Commissioner

Julie Farber, Deputy Commissioner

Sabine Chery, Assistant Commissioner

Selina Higgins, LCSW-R, Executive Director,
Office of Child Trafficking Prevention and Policy

About the Office of Child Trafficking Prevention and Policy

The ACS Office of Child Trafficking Prevention and Policy (OCTPP) works to raise awareness of trafficking and assists in identifying appropriate services available to help trafficked and at-risk youth and their families.

OCTPP responds to inquiries, provides consultation and technical assistance, develops and provides training, maintains the Child Trafficking Database (CTDB) and works with stakeholders to develop policies and procedures for best practice work with trafficked and at-risk youth.

OCTPP also leads **“Movin’ On”: The NYC Child Tattoo Eradication Project and Network**, which focuses on referrals for tattoo consultations with medical providers for exploited and gang involved youth.

WHO TO CALL IF YOU HAVE A REASONABLE SUSPICION THAT A CHILD HAS BEEN TRAFFICKED:

Everyone:

- The National Human Trafficking Hotline at 888-373-7888 or Text to 233733
- NYPD Human Trafficking Hotline: 646-610-7272
- If a child is trafficked and missing from home or a program: please report the missing child to local law enforcement and notify the National Center for Missing and Exploited Children (NCMEC) at 1-800-THE-LOST (800-843-5678), or use their Cyber Tipline at www.missingkids.com
- If the suspected trafficker is a parent or person legally responsible for the child: The NY Statewide Central Register of Child Abuse and Maltreatment at: 1-800-342-3720
- If you have reason to believe that a youth is being abused or neglected while placed in residential care, call the New York State Justice Center at 1-855-373-2122

To learn more, please visit:
www1.nyc.gov/site/acs/youth/traffickedyouth.page

- To report trafficked child cases/case inquiries:
Child.trafficking@acs.nyc.gov
- For information on upcoming trainings:
Traffickingtraining@acs.nyc.gov
- For Child Trafficking Database (CTDB) concerns:
CTDB@acs.nyc.gov
- For inquiries about removal of exploiter and gang tattoos:
Child.tattoo.removal@acs.nyc.gov

If you believe the person is in immediate danger, **call 9-1-1.**

If you are from ACS, Foster Care, Preventive Services or Juvenile Justice, please **ALSO** notify:

- The ACS Child Trafficking Mailbox at: Child.trafficking@acs.nyc.gov
- NYPD, using the OCFS-3922 form as per 15-OCFS-ADM-16, for a child meeting the Federal Definition of Sex Trafficking. After completing the form, fax to NYPD at: 212-694-3149 or 212-694-0264, and follow up with a phone call to 212-694-3013, which is the Vice Division Office, available Monday through Friday, 10 am to 6 pm. After 6 pm or on weekends, call 646-610-7272
- The NYS Office of Temporary and Disability Assistance (OTDA) to commence the victim confirmation process for a child meeting the Federal Definition of Sex Trafficking. Fax the New York State Referral of Human Trafficking Victim to 518-485-9611



Understanding Child Trafficking and What YOU Can Do

CHILDREN ARE NOT FOR SALE



NAVY BLUE is the official color for Human Trafficking Awareness and Prevention. By wearing a navy blue ribbon we help raise awareness of human trafficking and child sexual exploitation.



What is Human Trafficking?

Human Trafficking is **MODERN DAY SLAVERY**. Human Trafficking occurs whenever a person engages in sexual and/or labor services for the benefit of someone else due to force, fraud or coercion, OR whenever a young person under the age of 18 is involved in a commercial sex act.

Types of Human Trafficking:

- Labor Trafficking
- Sex Trafficking
- Commercial Sexual Exploitation of Children
- Organ Trafficking



Child Labor Trafficking:

When a child under the age of 18 is included to perform labor or services through force, fraud or coercion.

- **Force: When a person controls another person through violence** Assault, rape, food/sleep deprivation, forced drug use, kidnapping
- **Fraud: Tricking people into something they wouldn't otherwise do** Fraudulent employment contracts, promise of love/marriage, bait and switch
- **Coercion: Using threats against the survivor or their loved ones** Threat of deportation or blackmail, debt bondage, left threats, withholding wages or legal documents, psychological manipulation

Sex Trafficking (Federal Definition):

As per the Trafficking Victims Protection Act (TVPA): "the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act"

Child Sex Trafficking:

Any instance where a person under the age of 18 has exchanged a sexual act or performance in exchange for something of value. This is known as Commercial Sexual Exploitation of Children (CSEC).

Child Sex Trafficking: The Commercial Sexual Exploitation of Children (CSEC)

CSEC occurs whenever a person under the age of 18 has exchanged a sexual act or performance for something of value. CSEC can consist of:

- Engaging or agreeing or offering to engage in sex in return for a fee, or for any item of value
- Child Pornography (sexually explicit photographs, videos)
- Exotic Dancing or Performance
- Stripping
- Escort Services
- Trading sex for food, clothing, a place to stay, or other basic needs

CSEC is a crime! It should be reported, and appropriate services provided to survivors!

Youth Who Are Especially Vulnerable to Trafficking Include:

- Runaway or homeless Youth
- Children involved in the Foster Care system and/or Juvenile Justice System(s)
- Children with a history of abuse (especially sex abuse), maltreatment or neglect
- Children with a history of substance abuse
- Children with disabilities (mental illness, developmental, physical)
- LGBTQ Youth
- Refugees, Immigrants or Non-English Speaking Youth

Warning Signs (Red Flags) for Child Sex and Labor Trafficking:

- Runs away from home frequently and/or for significant periods of time;
- Shows signs of mental, physical, or sexual abuse;
- Has a significantly older partner or spends a lot of time with a controlling person or older adult;
- Indications or reports of domestic violence/intimate partner violence;
- Lies about age or carries a fake form of identification;
- Housing is provided by employer;
- Significantly reduces contact with family, friends, or other support networks;
- Displays a pattern of staying in the homes of friends or a non-legally responsible adult;
- Reluctant to discuss how they make money, where they live, how or when they came to the U.S.;
- Lacks control over schedule and/or money;
- Has large amounts of money or costly items that s/he cannot reasonably afford;
- Involvement in systems such as social services, PINS, courts, etc.;
- Works more than he or she is in school or does not often attend school;
- Experiences suicidal ideations and/or depression.
- Explanations for injuries are inconsistent with their severity;
- Has had multiple sexually transmitted infections and/or abortions;
- Has suspicious tattoos or burn marks (branding);
- Exhibits overt sexualized behavior;
- Exhibits evidence of sexual abuse;
- Is unwilling to disclose whereabouts or information about parents or caregivers;
- Is restricted in communication and/or displays anxious, fearful, depressed, submissive, tense and nervous behavior;
- Is unwilling or unable to identify as a victim;
- Youth retells the same story in the same way many times, giving the appearance that the story has been coached;
- Is scared of consequences to a degree greater than a situation (for example being late) merits.

NYC Administration for Children's Services' Office of Child Trafficking Prevention and Policy:
A Selection of NYC Services for Sex and/or Labor Trafficked Youth



- **NYC Administration for Children's Services' Office of Child Trafficking Prevention and Policy:** Child.trafficking@acs.nyc.gov
OCTPP leads all aspects of ACS' policy and practice concerning trafficked and commercially sexually exploited children.
- **NYC Administration for Children's Services' Immigrant Services:** Training and technical assistance, information about legal services and resources. Contact: **917-551-7968**.
- **Ali Forney Center:** Housing and supportive services for male and female LGBTQ youth: **212-222-3427** or www.aliforneycenter.org
- **City Bar Justice Center's Immigrant Justice Project:** Free assistance for asylum seekers fleeing persecution in their home countries, survivors of violent crimes & trafficking, and individuals seeking humanitarian protection and other forms of relief. **212-382-6710**
- **Day One:** Individual services for exploited and trafficked males & females, and intimate dating violence, training: **212-566-8120**, Ext. 5692 or socialworker@dayoneny.org
- **The Door:** Multi-service center for all teens (male, female, LGBTQ) ages 12 to 21: **212-941-9090** or www.door.org
- **GEMS:** Individual and group work services for exploited and trafficked females, housing, mentoring training: www.gems-girls.org
- **Hetrick Martin Institute:** Services and referrals for male and female LGBTQ youth ages 13 to 24: **212-674-2400** or www.hmi.org
- **JCCA's Gateways Program (JCCA):** Residential Foster Care for females (active ACS cases must be referred through the Office of Placement): gateways@jccany.org
- **JCCA's Center for Healing:** Evidence based, clinical services for children and families who have experienced sexual abuse and/or exploitation. **914-769-0164**
- **Mt. Sinai Adolescent Health Center:** FREE Medical, Dental, Optometry, Mental Health, Counseling, Mentoring and Transitioning Services for males and females up to age 24 (must register by age 22): **212-423-3000** for appointment
- **New Beginnings at Mt. Sinai-St. Luke's:** Preventive services with family participation, specifically for sexually abused and/or trafficked males and females: **212-523-2685**
- **PurPLE Clinic:** FREE safe primary health care clinic for male and female survivors of sex abuse and/or trafficking: purpleclinic@institute.org
- **Safe Horizon's Anti-Trafficking Program:** Counseling, basic needs, legal services, linkage to services, training. **718-943-8631**
- **Safe Horizon's Streetwork Project:** Drop In Centers in all 5 boroughs: www.safehorizon.org
- **Sanctuary for Families' Immigration Intervention Project:** Services in over 30 languages, locations in 4 boroughs, but serves Citywide. **718-250-4240** or www.sanctuaryforfamilies.org
- **Sanctuary for Families' Justice and Empowerment for Teens (JET) Initiative:** Training, advocacy and clinical services for all exploited or risk of exploitation youth. Email: amathieson@sffny for the referral form.
- **U.S. Department of Labor, Wage and Hour Division:** Community education/training, referrals, investigates employers recovers back wages for immigrants or labor trafficked, minors, wage loss and wage theft victims. **212-264-8185** or www.wagehour.dol.gov

“Movin’ On”: The NYC Child Tattoo Eradication Project and Network

Mission: To assist trafficking victims and former gang members in positively moving forward with their lives through the provision of trauma informed tattoo removal and the provision of relevant support.

Goals:

- To ensure that all youth have the opportunity to have an exploiter or gang branding safely removed.
- To link together medical and social work professionals willing to contribute time and expertise towards removing tattoos from child trafficking victims and youth leaving street gangs.
- To reduce trauma by connecting medical providers with case planners and youth to provide an opportunity for shared discussion and situational understanding.
- To provide tattoo removal in a trauma informed, and physically and emotionally safe environment.
- To provide training to medical providers on trafficking and gang dynamics to enhance their knowledge of, and empathy for branded youth.

Why this happened:

Based upon the recognition that exploiter brands inhibit the emotional healing progress, ACS’ Office of Child Trafficking Prevention and Policy (OCTPP) has linked together multiple NYC medical providers and social workers who demonstrated an interest in helping tattooed youth eradicate exploiter tattoos and gang markings. In affiliation with FPS’ Office of Older Youth Services and ACS’ Agency Medical Director, OCTPP is developing a comprehensive network towards meeting the needs of identified youth who want to progress positively with their lives.

What We Will Provide:

What we will provide is a referral for consultation with a medical provider. Tattoo removal can take many sessions and can be very painful. It’s a very individualized situation based upon the number of tattoos, the size and placement, skin tone and other factors. A youth will need to discuss the specific request with the medical provider before making an informed decision. Additionally, parental consent is necessary (even when a youth is in care), unless the youth is married or is a parent.

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Minimizing Trauma:

There are a lot of youth with brandings and not a lot of pro bono services currently available, so please be prudent in sharing this information with youth. At this time we would like to concentrate on youth who have voluntarily indicated they would like to have the tattoos removed, which often happens when they want to seek employment out of the life or away from the gang, rather than advertise generally to all youth. We want to reduce trauma, not heighten it, so we do not want to make any promises that are delayed due to a long waiting list. Additionally, a youth really needs to be ready, both emotionally and physically, so please choose those who meet this criteria.

Therefore, due to a currently finite ability to obtain free services, please do not solicit youth about having their tattoos removed if they have not yet mentioned it, or if you have not observed signs of self-removal. (It is very important to be observant of self-harm for any reason, but self-harm also extends to youth who try to remove their tattoos themselves.) As we develop extended capacity within the medical community, we will start advertising widely.

Additionally, the experience involved with exploitation or gang affiliation is traumatic, and the permanent inking of a youth's body and psyche compounds the trauma experienced. The tattoo removal process may result in emotional disturbance and stress. **All youth who decide to have their tattoos removed MUST receive continual supportive counseling from staff of an agency with expertise in working with youth who have experienced trafficking or gang affiliation.** If the case planner requires assistance in locating an agency with this expertise, please email OCTPP at Child.tattoo.removal@acs.nyc.gov

Communication:

To facilitate communication, OCTPP has established a dedicated electronic mailbox available at: Child.tattoo.removal@acs.nyc.gov Access to the mailbox is limited to three persons with the expertise and experience to conference requests: The Director of OCTPP, The Assistant Commissioner of the Office of Older Youth Services, and the Agency Medical Director), in order to maintain confidentiality.

All requests to the mailbox will be assessed for sufficiency of information, then scheduled for initial discussion as to whether the youth meets the criteria for referral.

Referral Criteria:

1. **ACS Affiliation:** Youth must be affiliated with ACS at the time of the request.
2. **Priority:** Priority will be given to youth with tattoos that impact upon safety and well-being and minimize the potential for progress:

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- a. Highest priority: Exploiter- and gang-related tattoos in highly visible places (face, hands, neck) that impact upon the physical safety and psychological well-being of youth
- b. Secondary Priority: Exploiter- and gang-related tattoos in not highly visible places (other body parts) that impact upon the psychological well-being of youth.
- c. Non Priority: A youth who wants to have a decorative tattoo removed that is not exploiter- or gang-affiliated, does qualify for the program, but will not take priority over a safety and/or psychological well-being need.

3. Who Can Consent:

- a. Parental consent is required for all youth under the age of 18, except as noted below:
- b. Parental consent is not required when:
 - i. A youth is age 18 or over; or
 - ii. A youth under the age of 18 is either currently married or is a parent.

4. Consent Form:

- a. A consent form must be signed by either the parent of a youth under the age of 18, or by a youth age 18 or over (or a youth under the age of 18 and is either married or a parent). The form will be signed after the medical consultation, but prior to the commencement of treatment.
- b. The form must be scanned and emailed to OCTPP at:
Child.Tattoo.Removal@acs.nyc.gov
- c. Only after the waiver is received by OCTPP, will the medical provider be authorized to proceed with treatment.

5. Required Information for Consideration:

1. Youth's full name
2. Date of birth and age
3. Tattoo description and location (including ink color)
4. Reason for request (please explain the safety or psychological well-being need)
 - a. Tattoo is an exploiter branding
 - b. Tattoo represents gang affiliation
 - c. Youth is attempting to obtain employment and cannot due to tattoo
 - d. Other reason impacting safety or psychological wellbeing
 - e. Youth wishes to remove decorative tattoo he/she/they regret (tattoo not exploiter or gang affiliated)

6. Referral Process:

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Upon approval:

1. The case planner will receive (1) a consent form and (2) a list of medical providers.
2. The case planner will call the medical providers on the list and discuss the needs of the youth, and based upon discussion, select a provider and schedule the appointment.
3. Youth under the age of 18 (unless married or is a parent) should be accompanied by their parent.
4. After the consultation with the medical provider, if the decision is to proceed with the tattoo removal, the parent for youth under the age of 18, or a youth age 18 or over (or is married or a parent under the age of 18) will sign the waiver form.
5. The case planner will scan and email the signed waiver form to OCTPP at: Child.tattoo.removal@acs.nyc.gov The process cannot commence without signed waiver receipt by OCTPP.
6. OCTPP will contact the medical provider after receipt of the waiver, and authorize commencement of treatment.
7. The case planner should keep OCTPP updated on the status and results of the process by emailing Child.tattoo.removal@acs.nyc.gov

Division of Child Protection (DCP) Business Processes for Screening for and Documenting CSEC

I. Protective Diagnostic (PD)

- A. The PD Child Protective Specialist (CPS) who has case planning responsibility must complete the **Rapid Indicator Tool** in the Child Trafficking Database (CTDB) within seven (7) days of the initiation of the child protective investigation. Please note that this is a stricter timeframe than that which is outlined in the policy.
1. If a child discloses CSEC or sex trafficking during the course of an investigation, the PD CPS must indicate that the child meets the federal definition of a Child Sex Trafficking Victim in the CTDB and fill in the required information as prompted by the CTDB.
 2. The PD CPS must re-administer the **Rapid Indicator Tool** during the child protective investigation if there are indicators that appear to give cause to believe the child is a sex trafficking victim or at risk of becoming a victim after an initial **Rapid Indicator Tool** is completed.
 3. Screening results must be entered into the CTDB and the CNNX Sex Trafficking window prior to the closure of an investigation, regardless of the outcome of the investigation.
- B. If any indicator has been selected on the Rapid Indicator Tool or the child or youth has disclosed current victimization or history of sex trafficking, the PD CPS must complete the **Comprehensive Tool** within 30 days of the screening with the Rapid Indicator Tool.
1. If the indicators selected in the **Comprehensive Tool** indicate that the child is meets a “medium level” or a “high-level” risk of trafficking, the PD CPS must meet with the IC and the applicable Clinical Consultant(s), as soon as possible, for further guidance and continued monitoring of the child(ren).
 2. If the **Comprehensive Tool** indicates that the child meets the federal definition of a sex trafficking victim, the PD CPS and the Instant Response Team Coordinator (IRTC) must report the identified child to law enforcement *immediately, but no later than 24 hours after identification of the child as a victim*. Therefore, these specific actions must occur immediately:
 - a. The PD CPS must immediately complete the hard copy version of the **Law Enforcement Report Form** and submit the form to the IRTC.
 - b. The IRTC must fax the **Law Enforcement Report Form** immediately to NYPD or NYSIC at the number on the form, call to confirm receipt, obtain the log number,

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and the name of the detective taking the IRTC's call. The IRTC must also provide the log number and the name of the detective, who took the IRTC's call, to the PD CPS.

- c. The PD CPS must document the information from the **Law Enforcement Report Form** into the CTDB within 30 days of the screening initiation date.
3. If applicable, the PD CPS must proceed to the next steps detailed in the General Policy Section IV(E), starting with the New York State confirmation process.

II. Family Service Unit (FSU)

- A. The FSU CPS, when s/he has case planning responsibility, must complete the **Rapid Indicator Tool** in the CTDB by each FASP deadline, and/or re-administer the **Rapid Indicator Tool** when there are indicators that give cause to believe the child is a sex trafficking victim or at risk of becoming a victim.
- B. The FSU CPS must also follow the same requirements and guidelines as the PD CPS, as detailed in Section VI(B)(1) of the policy.

III. Family Assessment Response (FAR)

- A. The FAR Child Protective Specialist (CPS), when s/he has case planning responsibility, must complete the **Rapid Indicator Tool** in the Child Trafficking Database (CTDB) within seven (7) days of the initiation of the case. Please note that this is a stricter timeframe than that which is outlined in the policy.
 1. If a child discloses CSEC or sex trafficking during the course of a case, the FAR CPS must indicate that the child meets the federal definition of a Child Sex Trafficking Victim in the CTDB and fill in the required information as prompted by the CTDB.
 2. The FAR CPS must re-administer the **Rapid Indicator Tool** during the response if there are indicators that appear to give cause to believe the child is a sex trafficking victim or at risk of becoming a victim after an initial **Rapid Indicator Tool** is completed.
 3. Screening results must be entered into the CTDB and the CNNX Sex Trafficking window prior to the closure of every FAR case, regardless of the case outcome.
- B. If any indicator has been selected on the Rapid Indicator Tool or the child or youth has disclosed current victimization or history of sex trafficking, the FAR CPS must complete the **Comprehensive Tool** within 30 days of completing the Rapid Indicator Tool if any indicator was selected in the CTDB.

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1. If the indicators selected in the **Comprehensive Tool** indicate that the child meets a “medium level” or a “high-level” risk of trafficking, the FAR CPS must meet with the IC and the applicable Clinical Consultant(s), as soon as possible, for further guidance and continued monitoring of the child(ren).

2. If the **Comprehensive Tool** indicates that the child meets the federal definition of a sex trafficking victim, the FAR CPS and the Instant Response Team Coordinator (IRTC) must report the identified child to law enforcement *immediately, but no later than 24 hours after identification of the child as a victim*. Therefore, these specific actions must occur immediately:
 - a. The FAR CPS must immediately complete the hard copy version of the **Law Enforcement Report Form** and submit the form to the IRTC.

 - b. The IRTC must fax the **Law Enforcement Report Form** immediately to NYPD or NYSIC at the number on the form, call to confirm receipt, obtain the log number, and the name of the detective taking the IRTC’s call. The IRTC must also provide the log number and the name of the detective, who took the IRTC’s call, to the FAR CPS.

 - c. The FAR CPS must document the information from the **Law Enforcement Report Form** into the CTDB within 30 days of the screening initiation date.

- C. If the Comprehensive Tool indicates that the child meets the federal definition of a sex trafficking victim, the FAR CPS must proceed to the next steps detailed in the General Policy Section IV (E), starting with the New York State confirmation process

Division of Youth and Family Justice (DYFJ) and Provider Agencies Business Processes for Screening for and Documenting CSEC

I. Family Assessment Program (FAP)

The following steps must be taken for any FAP case, regardless of whether the case originated from a non-indicated referral (in such cases, a designated FAP staff member will be responsible for the steps as outlined) or if the case is designated a services case (in these cases, the assigned case planner is responsible to the steps as outlined).

- A. Designated ACS FAP staff or case planner must complete the **Rapid Indicator Tool** for youth in the Child Trafficking Database (CTDB) as soon as possible. The screening must be conducted prior to the completion of the initial FASP and no more than 30 days after screening initiation (see Section IV(B) of the policy).
- B. Designated ACS FAP staff or case planner must re-administer the **Rapid Indicator Tool** any time a youth returns to the program from AWOC status **or** when there are indicators that give cause to believe the youth is a sex trafficking victim or at risk of becoming a victim.
- C. If applicable, the designated ACS FAP staff or case planner must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**.
 1. If a youth discloses sex trafficking victimization during the course of an assessment, designated ACS FAP staff or case planner must note the youth's disclosure in the CTDB and in the youth's case file, and enter the required information as soon as possible, but not more than 30 days after screening initiation.
 2. If the Comprehensive Tool indicates that the youth meets the federal definition of a sex trafficking victim, the designated ACS FAP staff must notify child.trafficking@acs.nyc.gov of the youth's name and date of birth if the youth meets the federal definition for child sex trafficking victim. In such cases, designated staff must also fill out the **Law Enforcement Referral form** as outlined in the General Policy Section IV(D). Additional required notification is outlined in Section IV(E).
 - a. If the youth and his or her family are referred to a FAP provider agency for services, the designated ACS FAP staff must print the completed screening and share with the receiving FAP provider agency.

II. Detention

- A. The ACS-contracted mental health clinician must complete the **Rapid Indicator Tool** in the CTDB within **seven (7) days** of the youth's arrival at the detention site or upon the

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youth's referral to the ACS-contracted mental health clinician, whichever comes first.¹ Please note that this is a shorter timeframe requirement to complete the Rapid Indicator Tool than referenced throughout the body of the policy. Please note that this is a stricter timeframe than that which is outlined in the policy.

- B. The ACS-contracted mental health clinician must re-administer the **Rapid Indicator Tool** immediately in the CTDB anytime a youth returns from absconding **and/or** when there are indicators that give cause to believe the youth is a sex trafficking victim or at risk of becoming a victim during the youth's custody.³²
 - 1. If a youth discloses sex trafficking victimization during the course of a Rapid Indicator Tool assessment or at any other time, the ACS-contracted mental health clinician must note the disclosure in the CTDB and in the youth's case file, and enter the required information as soon as possible, but within no more than 30 days of screening initiation.
- C. If any indicator is selected during the screening with the Rapid Indicator Tool or the youth self-discloses current victimization or a history of sex trafficking, the ACS-contracted mental health clinician or designated staff must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**.
 - 1. If the Comprehensive Tool indicates that the youth meets the federal definition of a sex trafficking victim, the ACS-contracted mental health clinician or designated staff must submit notification with the youth's name and date of birth to the child.trafficking@acs.nyc.gov and notify the youth's case manager whom, in turn, must notify the youth's attorney. In such cases, designated staff must also fill out the **Law Enforcement Referral form** as outlined in Section IV(D) of the policy. Additional required notification is outlined in Section IV(E) of the policy.
 - 2. After disposition, the ACS-contracted mental health clinician must also share a printed version of the completed screen(s) with the ACS Intake and Assessment Specialist, designated staff from the receiving Non-Secure Placement (NSP)/Limited Secure Placement (LSP), and/or designated staff from the Juvenile Justice Initiative (JJI) program.

III. Juvenile Justice Initiative (JJI)

- A. The provider agency case planner or designated staff must complete the **Rapid Indicator Tool** in the CTDB as soon as possible, but within no more than 30 days of screening initiation and by the due date of the initial FASP.

¹ This screening must be conducted in addition to the information obtained from the youth and others outlined in Section XIII of [ACS Policy 2015/06, Prevention, Detection and Response to Sexual Misconduct in the Division of Youth and Family Justice Detention Services](#), dated July 2, 2015.

³² Detention staff must refer to Attachment "P" for guidance if re-administering the screening for any youth.

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- B. The JJI provider agency case planner or designee must re-administer the **Rapid Indicator Tool** immediately in the CTDB anytime a youth returns home or to the program after absconding **and/or** if there are any indicators that give cause to believe the youth is a sex trafficking victim or at risk of becoming a victim during the youth's enrollment in the program.
 - 1. If a youth discloses sex trafficking victimization during the course of a Rapid Indicator tool assessment or at any other time, the JJI provider agency case planner or designee must note the disclosure in the CTDB and in the youth's case file, and enter the required information within 30 days of screening initiation.
- C. If any indicator is selected during the screening with the Rapid Indicator Tool or the youth self-discloses current victimization or a history of sex trafficking, the JJI provider agency case planner or designee must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**.
 - 1. If the Comprehensive Tool indicates that the youth meets the federal definition of a sex trafficking victim,, the JJI provider agency case planner or designee must immediately submit notification of the youth's name and date of birth to child.trafficking@acs.nyc.gov for any identified sex trafficked youth. In such cases, designated staff must also fill out the Law Enforcement Referral form as outlined in Section IV(D) of the policy. Additional required notification is outlined in Section IV(E) of the policy.

IV. ACS Intake and Assessment Unit (ACS IA)

- A. The ACS Intake and Assessment Specialist must complete the **Rapid Indicator Tool** in the CTDB and in the youth's case file before a youth is assigned to a placement.² The Intake and Assessment Specialist must also document the required information in CNNX.
- B. The ACS Intake and Assessment Specialist must share a printed version of all completed screens with the receiving PPS and NSP or LSP residential provider upon placement.
 - 1. If a youth discloses sex trafficking victimization during the course of intake, the ACS Intake and Assessment Specialist must note the disclosure in the CTDB and in the youth's case file and notify the provider when the youth is placed. The screening results must be entered in the CTDB as soon as possible, but not more than 30 days of screening initiation.

² This screening must be conducted in addition to the information obtained from the youth and others outlined in Section XIII of [ACS Policy 2015/06](#), *Prevention, Detection and Response to Sexual Misconduct in the Division of Youth and Family Justice Detention Services*, 7/2/15.

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- a. If any indicator is selected in the **Rapid Indicator Tool**, the receiving Non-Secure Placement (NSP) or Limited Secure Placement (LSP) residential provider case planner or designee must complete the **Comprehensive Tool** in the CTDB as soon as possible, but not more than 30 days of the screening initiation date unless the ACS-contracted mental health clinician previously completed the **Comprehensive Tool**. The receiving NSP or LSP residential provider case planner must enter the required information in the youth's case file and in the CTDB.
- b. If applicable, the receiving NSP or LSP residential provider agency case planner or designee must proceed to the next steps detailed in the General Policy Section IV (D), including completing and submitting the **Law Enforcement Report Form**.

V. Close to Home: Non-Secure Placement (NSP), Limited Secure Placement (LSP) and Aftercare

- A. The Close to Home provider agency case planner or designee must complete the **Rapid Indicator Tool** for the youth in the CTDB as soon as possible, but not more than 30 days after screening initiation *after* the youth's arrival at the NSP or LSP residential placement facility.³
- B. In addition, the Close to Home provider agency case planner or designee must complete the **Rapid Indicator Tool** as soon as possible. The screening must be conducted by the due date of the initial FASP and within no more than 30 days of the youth's release to the community when the youth is receiving aftercare services.
- C. The Close to Home provider agency case planner or designee must re-administer the **Rapid Indicator Tool** in the CTDB if there is any indication of suspected sex trafficking during the youth's placement, during the youth's enrollment in the program and/or if the youth returns home or to the residential placement after a period of unauthorized absence (AWOC).
 1. If a youth discloses sex trafficking victimization during the course of placement or program enrollment, the Close to Home provider agency case planner or designee must note the disclosure in the CTDB and in the youth's case file, and enter the required information as prompted in the CTDB as soon as possible, but not more than 30 days after screening initiation.
- D. If applicable, the Close to Home provider agency case planner or designee must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**.

³ This screening must be conducted in addition to the information obtained from the youth and others outlined in Section XIII of [ACS Policy 2015/06](#), *Prevention, Detection and Response to Sexual Misconduct in the Division of Youth and Family Justice Detention Services*, dated July 2, 2015.

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- E. If applicable, the Close to Home provider agency case planner or designee must submit notification of the youth's name and date of birth to child.trafficking@acs.nyc.gov, for any identified sex trafficked youth.

- F. For NSP and LSP residential placements only, the provider agency case planner or designee must also share a printed version of the completed screens with the designated staff from the receiving Close to Home aftercare program.

Division of Prevention Services (DPS) and Provider Agencies Business Processes for Screening for and Documenting CSEC

I. Prevention Service Case referred by DCP and Other Provider Agencies

- A. The case planner or designated staff must first confirm whether the ACS CPS or the sending provider agency previously completed the **Rapid Indicator Tool** in the Child Trafficking Database (CTDB) for the child(ren). If the ACS CPS did not complete the tool, the case planner or designated staff must complete the **Rapid Indicator Tool** as soon as possible, but no more than 30 days after screening initiation. The Rapid Indicator Tool results must be entered in the CTDB by the due date of the initial and each comprehensive FASP.
- B. The case planner or designated staff must re-administer the **Rapid Indicator Tool** in the CTDB for the child(ren) when there are new or newly-observed indicators that give cause to believe the child is a victim or is at risk of becoming a victim, and/or whenever a child returns after being missing from the home or after having run away from home.
 - 1. If a child discloses sex trafficking victimization during an open Prevention service case, the case planner or designated staff must note the disclosure in the CTDB and in the child's case record, and enter the required information as prompted by the CTDB within 30 days of screening initiation.
- C. If any indicator has been selected on the Rapid Indicator Tool or the child or youth has disclosed current victimization or history of sex trafficking, the case planner or designated staff must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**. If applicable, the case planner or designated staff must also request an Elevated Risk Conference and call in a report of abuse or maltreatment to the Statewide Central Register (SCR) if a parent or person legally responsible is suspected to be involved in the sex trafficking.
- D. If a child meets the federal definition of child sex trafficking victim, the case planner or designated staff must immediately notify their supervisor, manager, or Program Director and notify ACS by emailing child.trafficking@acs.nyc.gov.

II. Prevention Service Advocates Prevention-Only (ADVPO) Case (self-referred)

- A. The case planner or designated staff must complete the paper format of the **Rapid Indicator Tool** for the child(ren) within 30 days of screening initiation and by the due date of the initial FASP or by the due date of each subsequent FASP. The completed paper version of the tool must be stored in the family's case record.

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- B. The case planner or designated staff must re-administer the **Rapid Indicator Tool** in the CTDB for the child(ren) when there are indicators that give cause to believe the child is a victim or is at risk of becoming a victim.
 - 1. If a child discloses sex trafficking victimization during the life of a Prevention service advocate case, the case planner must note the disclosure in the hard copy case record and complete the screening within 30 days of screening initiation.
- C. If any indicator has been selected on the Rapid Indicator Tool or the child or youth has disclosed current victimization or history of sex trafficking, the case planner must proceed to the next steps detailed in the General Policy Section IV(C), using the paper format of the **Comprehensive Tool**. If applicable, the case planner must also request an Elevated Risk Conference and call in a report of abuse or maltreatment to the Statewide Central Register (SCR) if a parent or person legally responsible is suspected to be involved in the sex trafficking.
- D. If a child meets the federal definition of child sex trafficking victim, the case planner or designated staff must immediately notify their supervisor, manager, or Program Director and notify ACS by emailing child.trafficking@acs.nyc.gov.

Division of Family Permanency Services (FPS) and Provider Agencies Business Processes for Screening for and Documenting CSEC

I. ACS FPS – Specialized Care Unit (SCU)

- A. The case planner will complete the **Rapid Indicator Tool** for children and youth in the Child Trafficking Database (CTDB) within 30 days of screening initiation **and** when the following triggers occur:
1. Immediately upon the child or youth entering foster care placement in which SCU has oversight and if DCP, the Children’s Center (CC), Youth Reception Center (YRC), or provider agency did not previously complete the **Rapid Indicator Tool** in the CTDB;
 2. By the next Family Assessment and Service Plan (FASP) due date;
 3. Immediately any time a child or youth returns to placement after having been missing or Absent Without Consent (AWOC);
 4. Immediately when a child or youth discloses or is suspected of CSEC involvement throughout the life of the case;
 5. When a child or youth under 21 years old enters or re-enters foster care and there is suspicion of CSEC involvement by staff;
 6. Immediately if a child or youth is psychiatrically hospitalized and discloses CSEC involvement;
 7. Immediately when a child or youth is arrested or detained for CSEC involvement and returns to the foster care agency; or
 8. Immediately when there is suspicion that the child or youth is CSEC involved during a Family Team Conference (FTC) regarding a goal change, permanency planning, placement change, trial discharge or final discharge.
 9. If a child or youth discloses CSEC or sex trafficking during the course of placement, the case planner must document the disclosure in the CTDB and in CONNECTIONS (CNNX), and enter the required information as prompted by the CTDB within 30 days of screening initiation.
- B. If any indicator has been selected on the Rapid Indicator Tool or the child or youth has disclosed current victimization or history of sex trafficking, the case planner must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**.

II. Pre-Placement

A. The Nicholas Scoppetta Children's Center (CC)

1. The Child and Family Specialist (CFS) must confirm, via the CTDB, whether ACS CPS or the designated provider agency staff previously completed the **Rapid Indicator Tool** for the child or youth upon entry into the CC.
 - a. If ACS CPS or the designated provider agency did not previously complete the **Rapid Indicator Tool**, the CFS must complete the **Rapid Indicator Tool** within 24 hours of the child or youth's entry into the CC in the CTDB. The CFS must consult with nursing staff on-site³³ and the ACS CPS or case planner, if any, assigned to the child or youth for further information.
 - i. Please note that this is a shorter timeframe requirement to complete the Rapid Indicator Tool than referenced throughout the body of the policy.
 - b. If ACS CPS or the designated provider agency previously completed the **Rapid Indicator Tool** in the CTDB and an indicator is selected for the child or youth, the CFS must notify the CSEC consultant on-site, if any, and nursing staff.
 - c. If ACS CPS or the designated provider agency previously completed the **Rapid Indicator Tool** in the CTDB and no indicator is selected for the child or youth, the CFS must monitor the child or youth and complete a new **Rapid Indicator Tool** in the CTDB when a child or youth returns from AWOC status during the child or youth's stay at the CC, and/or when there are indicators that give cause to believe the child is a victim or is at risk of becoming a victim.
 - i. If applicable, the CSEC consultant on-site or designated staff member must complete the hard copy version of the **Comprehensive Tool**. The CFS must complete the **Comprehensive Tool** in the CTDB as soon as possible, but no more than 30 days of electronic screening initiation. Nursing staff must prepare for potential obstetrician and gynecological follow-up and planning.
 - ii. If applicable, the CFS must proceed to the next steps detailed in the General Policy Section IV(D), the **Law Enforcement Report Form**.

³³ Nursing staff on-site will have cleared the child or youth prior to the CFS's initial contact with the child or youth. Similarly, the assigned ACS CPS or provider agency case planner will have had casework contacts with the child or youth prior to entering the Children's Center. In either circumstance, the child or youth may have disclosed statements or exhibited behavior resulting in red flags or indicators of CSEC or trafficking. The CFS can obtain more information for his or her assessment of the child or youth.

Attachment Q

- iii. If a child or youth discloses CSEC or sex trafficking during the course of pre-placement, the CFS and CSEC consultant on-site must note the disclosure in the CTDB and in CONNECTIONS (CNNX), and enter the required information as prompted by the CTDB.
- B. Youth Reception Center (YRC) Provider Agencies or Host Homes
- Upon the youth's entry into the YRC or Host Home, the intake/admissions department or designated staff must confirm, via the CTDB, whether ACS CPS or the CC completed the **Rapid Indicator Tool** for the youth.
1. If ACS CPS or the CC did not previously complete the **Rapid Indicator Tool**, the intake/admissions department or designated staff must complete the **Rapid Indicator Tool** within 24 hours of the youth's entry into the YRC or Host Home in the CTDB.
 2. If ACS CPS or the CC previously completed the **Rapid Indicator Tool** and an indicator is selected for the youth, the intake/admissions department or designated staff must complete the **Comprehensive Tool** as soon as possible, but not more than 30 days of screening initiation in the CTDB.
 3. If ACS CPS or the CC previously completed the **Rapid Indicator Tool** and no indicator is selected for the youth, the intake/admissions department must notify the team and document the required information in the CTDB and in CNNX.
 4. If applicable, the intake/admissions department or designated staff must proceed to the next steps detailed in the General Policy Section IV(D), the **Law Enforcement Report Form**.
 - a. If a child or youth discloses CSEC or sex trafficking during the course of casework contact, the intake/admissions department or designated staff must note the disclosure in the CTDB and in CNNX, and enter the required information as prompted in the CTDB within 30 days of screening initiation.
 5. Upon a FASP reassessment, the treatment team caseworker must re-administer the **Rapid Indicator Tool** and all applicable tools/actions if a child or youth is absent from program (AFP) or AWOC, and/or when there are indicators that give cause to believe the child or youth is a victim or is at risk of becoming a victim.

III. Provider Foster Care Agencies

- A. The case planner will complete the **Rapid Indicator Tool** in the CTDB within 30 days of screening initiation for children and youth by the same deadlines detailed above for ACS FPS SCU (Section VI(E)(1)).

Attachment Q

1. For cases involving Expectant and Parenting Youth (EPY) where parenting youth are in foster care while their child(ren) are not (also known as “8D cases”), the case planner can only conduct the screenings for the EPY who are in placement, not their child(ren).
 2. If a child discloses CSEC or sex trafficking during placement, the case planner must document the disclosure in the CTDB and in CNNX, and enter the required information as prompted in the CTDB within 30 days of screening initiation.
- B. If applicable, the case planner must proceed to the next steps detailed in the General Policy Section IV(C), the **Comprehensive Tool**. The case planner must document the required information, including whether the victimization, if any, occurred prior to or while the child or youth was in foster care, as prompted in the CTDB within 30 days of screening initiation and promptly in CNNX.
- C. The case planner must send any identified CSEC or sex trafficking findings to the ACS trafficking inbox at: child.trafficking@acs.nyc.gov